

**REMARKS**

Reconsideration and further examination of the application, as amended, are requested. All objection and rejections are respectfully traversed.

**§ 112, Second Paragraph**

In the Office Action, claims 1-16, 39, 40, 47-49 and 51 were rejected under 35 U.S.C. § 112, second paragraph.

The Office Action states that claim 1 is unclear because there is no way of determining which parity calculation method (subtraction and recalculation) requires the fewest reads without first performing each of the parity calculation methods.

Applicants respectfully disagree. As set forth in the Specification at p. 14, line 18 to p. 15, line 16, one way of deciding which parity calculation method requires the fewest reads is to determine the number of storage blocks to be written in each stripe. If the number to be written exceeds half the total number of storage blocks in the stripe, then the recalculation method will require the fewest reads, and is selected. If the number to be written is less than half the total number of storage blocks in the stripe, then the subtraction method will require the fewest reads, and is selected.

As shown, the parity calculation method requiring the fewest reads thus can be determined without having to perform each of the parity calculation methods. The MPEP, moreover, provides that clarity of claim language for purposes of § 112, second paragraph “must be analyzed ... in light of the content of the particular application disclosure.” *See* MPEP § 2173.02. Accordingly, Applicants submit that Claim 1 (as well as claims 16, 39, 40, 47, and 51) satisfies the requirements of § 112, second paragraph.

The Office Action next states that claim 2 is unclear because it does not provide the steps needed to maximize the chain lengths.

Applicants respectfully submit that Claim 2 satisfies §112, second paragraph.

Claim 2, in its entirety, states as follows:

2. A method for managing storage of data in a plurality of storage devices, each comprising a plurality of storage blocks, comprising:

generating block layout information; and

in response to the block layout information, controlling execution of I/O operations by identifying a plurality of contiguous storage blocks on a single storage device for use by each I/O operation so as to substantially minimize a number of read operations needed for calculation of error correction parameters across a stripe.

First, Applicants submit that Claim 2 does not simply recite the function of maximizing chain lengths. Indeed, the term “chain lengths” does not appear in Claim 2. Instead, in the first limitation, Claim 2 recites generating particular information, namely “block layout information”. Then, in the second limitation, Claim 2 recites controlling I/O operations by “identifying a plurality of contiguous storage blocks on a single device” in response to the block layout information.

Applicants submit that Claim 2 recites the particular steps of “generating block layout information”, and “controlling execution of I/O operations by **identifying a plurality of contiguous storage blocks** on a single storage device for use by each I/O operation” **in response to the block layout information**. Furthermore, the MPEP specifically states that functional language may be used in claims. *See* MPEP §2173.05(g). Accordingly, Applicants submit that Claim 2 (as well as claims 3-15) satisfies the requirements of §112, second paragraph.

The Office Action states that claim 47 is unclear because it fails to recite the necessary steps to “implement the selection.” Applicants have amended claim 47 to recite that the implementing of the selection occurs “during the writing of the data to the plurality of the storage devices.” No new matter is being introduced. Support for the amendment may be found in the specification as originally filed at p. 14, lines 1-17. Applicants submit that claim 47, as amended, satisfies the requirements of §112, second paragraph.

Claims 45, 46 and 50 are allowed, and claims 1-16, 39, 40, 47-49 and 51 would be allowable if amended to overcome the above-referenced §112, second paragraph rejections.

Applicants submit that the application, as amended, is in condition for allowance, and early favorable action is respectfully requested.

The Examiner is encouraged to contact the undersigned attorney if a discussion of the claims or any other issue might advance prosecution of this application.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

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